

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

United States of America

v.

Case No. 4:25-MJ-1002-KS

Charles Torekeyo Highsmith

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2, 2025 in the county of Pitt in the
Eastern District of North Carolina, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 922(g)(1) & 924

Felon in Possession of Firearm

This criminal complaint is based on these facts:

See attached

☒ Continued on the attached sheet.



Complainant's signature

Pete Ganzert, Special Agent, FBI

Printed name and title

Attested to by the complainant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone (specify reliable electronic means).

Date: 1/13/2025

Raleigh

City and state: ~~Greenville~~, North Carolina



Judge's signature

Kimberly A. Swank, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NORTH CAROLINA**

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Special Agent Pete Ganzert, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation, an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered to conduct investigations of or to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I am a Special Agent of the Federal Bureau of Investigation (FBI), and I am the case agent for this investigation.

2. I have been an SA with the FBI since February 2022. My training consisted of an 18-week FBI new agents' class during which I received instruction on various aspects of federal investigations. I am currently assigned to the Charlotte Division at the Greenville Resident Agency. Prior to the FBI, I worked in law enforcement and security for over twelve years, serving as a police officer, sheriff's investigator, Diplomatic Security Contractor, and Special Deputy U.S. Marshal. I was employed with the Pitt County Sheriff's Office, the Ayden Police Department, and the Chowan County Sheriff's Office from 2006 through 2014. I have been the case agent or participated in numerous investigations including but not limited to drug investigations, violent crime investigations, robbery investigations, firearms investigations, counterterrorism and counterintelligence investigations.

3. I make this affidavit in support of an application for the issuance of a criminal complaint in the matter of Charles Torekeyo Highsmith (**HIGHSMITH**) for possession of firearm by a convicted felon, in violation of Title 18, United States Code §§ 922(g)(1) and 924.

4. This affidavit is based on personal knowledge I have gained from my participation in this investigation, interviews by either myself or other participating officers during the investigation as well as conclusions I have reached based on my training and experience in the investigation of firearms offenses. Because this affidavit is being made solely for the purpose of establishing probable cause for the issuance of a criminal complaint, I have not included every known fact about the investigation.

BACKGROUND

5. As background, I encountered **HIGHSMITH** on May 3, 2024, during a traffic stop in an unrelated investigation by Greenville Police Department (GPD). During the investigation, I learned that **HIGHSMITH** was in possession of a firearm.

6. **HIGHSMITH** was arrested on an active state probation warrant as well as for possessing the firearm and charged by GPD with possession of a firearm by a convicted felon based on a 2014 felony conviction. **HIGHSMITH** was released on bond and the probation violation and state charge for possession of a firearm by felon are pending.

FACTS ESTABLISHING PROBABLE CAUSE FOR COMPLAINT

7. Relevant to the charge sought in this complaint, on January 2, 2025, GPD responded to 2815 Best Road, Apartment B in Greenville, North Carolina in reference to an armed home invasion. GPD interviewed the victims who stated that a black male entered the residence, armed with a black handgun with an extended magazine, while a second black male waited outside holding another black handgun with an extended magazine. The victims also stated that the

Handwritten initials

individual who entered the home discharged the firearm, shooting one of them in the arm, and then fled with the other individual in a red car with Georgia plates. The victims told GPD that they had seen both individuals in the apartment complex before and were familiar with them but did not know them. The victims also provided GPD with descriptions of the individuals to include their clothing and hair.

8. While at the residence, GPD located a .40 caliber shell casing where the shooting took place.

9. GPD and North Carolina Alcohol Law Enforcement (NCALE) were actively patrolling in the area of the residence in response to the call for service. During the patrol, officers spotted a red vehicle with Georgia plates leaving the area that matched the description provided by the victims. Officers pursued the vehicle which fled and failed to heed their lights and sirens.

10. The subject vehicle crashed into another driver and a utility pole approximately three to four miles away on Memorial Drive and Fifth Avenue in Greenville, ending the chase. When officers approached, they found an individual identified as Joshua O'Brian Strong (Strong) in the driver's seat. Strong matched the description provided by the victims as the individual who waited outside of the house, armed.

11. GPD was familiar with **HIGHSMITH** and identified him as the passenger. **HIGHSMITH** matched the description of the individual that entered the residence and shot one of the victims. GPD located a .40 caliber Glock handgun under the passenger seat which had been occupied by **HIGHSMITH** and a Highpoint 9mm handgun was found in the floorboard at **HIGHSMITH**'s feet. Both firearms were black and had extended magazines.

12. On September 23, 2014 **HIGHSMITH** was convicted of Attempted Armed Robbery in Martin County, North Carolina and sentenced to 80 to 180 months in the North Carolina

RJD


Department of Adult Corrections. This conviction establishes that **HIGHSMITH** was a felon and would be aware of his felon status.

13. I consulted with ATF Special Agent Raymond Reeves, ATF Interstate Nexus Examiner, and provided S/A Griffin the descriptions of a .40 caliber Glock handgun and a Highpoint, 9mm handgun. Based on his training and experience, S/A Reeves stated that the above are firearms as defined in Title 18, United States Code (USC), Chapter 44, Section 921(a)(3) and that the firearms were manufactured outside of North Carolina and therefore traveled in and/or effected interstate and/or foreign commerce prior to being possessed by **HIGHSMITH**.

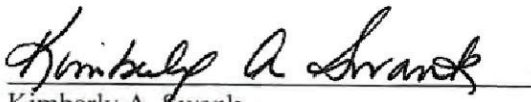
CONCLUSION

14. The information contained in this affidavit reveals that on or about January 2, 2025, Charles Torekeyo Highsmith possessed firearms affecting interstate commerce after having been convicted of a crime punishable by more than 12 months in prison. I believe that there is probable cause for the issuance of this criminal complaint and the arrest of Charles Torekeyo Highsmith.

Respectfully Submitted,


PETE GANZERT
Special Agent
Federal Bureau of Investigation

On this 13th day of January 2025, at or around 4:25 ~~XXX~~/PM, Special Agent Pete Ganzert appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of this Affidavit.


Kimberly A. Swank
United States Magistrate Judge